

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

DEBORAH CHIN, Individually and on)	Case No. 1:04-cv-10294-DPW
behalf of all others similarly situated,)	
)	
Plaintiff,)	
)	
vs.)	
)	
SONUS NETWORKS, INC., HASSAN)	
AHMED, STEPHEN NILL,)	
)	
Defendants.)	
)	

(Additional Captions Follow)

**DECLARATION OF THEODORE M. HESS-MAHAN IN SUPPORT OF THE
BELLAND GROUP'S MOTION TO CONSOLIDATE,
TO BE APPOINTED LEAD PLAINTIFF, AND
FOR APPROVAL OF ITS SELECTION OF CO-LEAD COUNSEL**

MICHELLE TREBITSCH, on behalf of herself and all others similarly situated,) Case No. 1:04-cv-10307-DPW
)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN M. AHMED, and STEPHEN J. NILL,)
)
)
Defendants.)

INFORMATION DYNAMICS, LLC, on behalf of itself and all others similarly situated,) Case No. 1:04-cv-10308-DPW
)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., PAUL. R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL,)
)
)
Defendants.)

PETER KALTMAN, on behalf of himself and all others similarly situated,) Case No. 1:04-cv-10309-DPW
)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., RUBIN GRUBER, HASSAN AHMED and STEPHEN NILL,)
)
)
Defendants.)

SAMANTHA DEN, individually and on behalf of all others similarly situated,) Case No. 1:04-cv-10310-DPW
)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN M. AHMED, and STEPHEN J. NILL)
)
)
Defendants.)

RONALD KASSOVER, on behalf of the Ronald Kassover IRA and all others similarly situated,) Case No. 1:04-cv-10329-DPW
)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN M. AHMED, STEPHEN J. NILL,)
)
)
Defendants.)

STEVE L. BAKER, Individually and on behalf of all others similarly situated,) Case No. 1:04-cv-10333-DPW
)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN NILL,)
)
)
Defendants.)

MICHAEL KAFFEE, Individually and on behalf of all others similarly situated,) Case No. 1:04-cv-10345-DPW
)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN NILL,)
)
)
Defendants.)

HAIMING HU, Individually and on behalf of all others similarly situated,) Case No. 1:04-cv-10346-DPW
)
)
Plaintiff,)
)
vs.)
)
)
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN NILL)
)
)
Defendants.)

CHARLES STARBUCK, Individually and himself and all others similarly situated,) Case No. 1:04-cv-10362-DPW
)
)
Plaintiff,)
)
vs.)
)
)
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN NILL,)
)
)
Defendants.)

SANUEL HO, Individually and on behalf of all others similarly situated,) Case No. 1:04-cv-10363-DPW
)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN)
AHMED, and STEPHEN NILL,)
)
Defendants.)

JEFFREY C. RODRIGUES, Individually on behalf of all others similarly situated,) Case No. 1:04-cv-10364-DPW
)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN M.)
AHMED, and STEPHEN J. NILL,)
)
Defendants.)

ROBERT CONTE and MARK RESPLER, on behalf of himself and all other similarly situated,) Case No. 1:04-cv-10382-DPW
)
)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN)
AHMED, and STEPHEN NILL,)
)
Defendants.)

WHEATON ELECTRICAL SERVICES)	Case No. 1:04-cv-10383-DPW
RETIREMENT 401 K PROFIT SHARING)	
PLAN, on behalf of itself and all others)	
similarly situated,)	
)	
)	
Plaintiff,)	
)	
vs.)	
)	
SONUS NETWORKS, INC., HASSAN)	
AHMED and STEPHEN J. NILL,)	
)	
Defendants.)	

BRIAN CLARK, Individually and on)	Case No. 1:04-cv-10454-DPW
behalf of all others similarly situated,)	
)	
Plaintiff,)	
)	
vs.)	
)	
SONUS NETWORKS, INC., PAUL R.)	
JONES, EDWARD N. HARRIS, J.)	
MICHAEL O'HARA, HASSAN M.)	
AHMED, and STEPHEN J. NILL,)	
)	
Defendants.)	

SHEILA BROWNELL, Individually and on)	Case No. 1:04-CV-10597-DPW
behalf of all others similarly situated,)	
)	
Plaintiff,)	
)	
vs.)	
)	
SONUS NETWORKS, INC., HASSAN)	
AHMED and STEPHEN NILL,)	
)	
Defendants.)	

SAVERIO PUGLIESE, on behalf of) Case No. 1:04-cv-10612-DPW
himself and all others similarly situated,)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN M.)
AHMED, STEPHEN J. NILL,)
)
Defendants.)

DAVID V. NOCITO, on behalf of) Case No. 1:04-cv-10623-DPW
himself and all others similarly situated,)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., HASSAN M.)
AHMED, and STEPHEN J. NILL,)
)
Defendants.)

I, Theodore M. Hess-Mahan, declare as follows:

1. I am an associate at the law firm of Shapiro, Haber & Urmy LLP. I submit this Declaration in support of the Belland Group's motion to consolidate, to be appointed Lead Plaintiff, and for approval of its selection of Co-Lead Counsel.

2. Attached hereto as Exhibit 1 is a true and correct copy of the notice caused to be published in PRNEWswire on February 12, 2004.

3. Attached hereto as Exhibit 2 is a true and correct copy of the certifications executed by Grace I. Belland, Leopoldo L. Mestre, Jacob I. Sherman, Scott L. Dunkley, Abdul S. Budhinani, and Sean P. McCarthy, collectively, the "Belland Group."

4. Attached hereto as Exhibit 3 is an analysis of the losses suffered by the Belland Group.

5. Attached hereto as Exhibit 4 is a true and correct copy of the firm resume of Murray, Frank & Sailer LLP.

6. Attached hereto as Exhibit 5 is a true and correct copy of the firm resume of Weiss & Yourman.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 12, 2004.

/s/Theodore M. Hess-Mahan
Theodore M. Hess-Mahan